

**STORZER & ASSOCIATES, P.C.**

Sieglinde K. Rath (SR7208)  
Roman P. Storzer, *admitted pro hac vice*  
Robert L. Greene, *admitted pro hac vice*  
1025 Connecticut Ave., N.W. Suite 1000  
Washington, D.C. 20036  
Tel: 202.857.9766  
Fax: 202.315.3996  
*Counsel for Plaintiffs*

**WILENTZ, GOLDMAN & SPITZER, P.A.**

Donna M. Jennings (DJ7790)  
90 Woodbridge Center Drive  
Post Office Box 10  
Woodbridge, New Jersey 07095  
*Co-Counsel for Plaintiff WR Property LLC*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

AGUDATH ISRAEL OF AMERICA, a New  
York non-profit corporation, and WR  
PROPERTY LLC, a New Jersey limited liability  
company,

Plaintiffs,

v.

TOWNSHIP OF JACKSON, NEW JERSEY,  
MICHAEL REINA, ROBERT NIXON, HELENE  
SCHLEGEL, JEFFREY PURPURO, WILLIAM  
CAMPBELL, and KENNETH PIESLAK,

Defendants.

Civ. No. 3:17-CV-03226

**DECLARATION OF DONNA M. JENNINGS**

Donna M. Jennings declares as follows, pursuant to 28 U.S.C. § 1746:

1. I am a shareholder at Wilentz, Goldman & Spitzer, P.A., attorneys for the Plaintiff, WR Property LLC and make this declaration in that capacity.
2. I respectfully submit this Declaration in support of Plaintiffs' Motion to Enjoin the Defendant Township.
3. Attached as **Exhibit 1** is a true and correct copy of the web page for CareOne at Jackson. [URL: <http://www.care-one.com/locations/careone-at-jackson/>]
4. Attached as **Exhibit 2** is a true and correct copy of excerpts of the deposition of Mayor Michael Reina, taken on July 22, 2019.
5. Attached as **Exhibit 3** is a true and correct copy of an email from Michael Reina dated October 31, 2014, Bates stamped OBY21464.
6. Attached as **Exhibit 4** is a true and correct copy of an email from Michael Reina dated August 29, 2016, Bates stamped TWP003429-003431.
7. Attached as **Exhibit 5** is a true and correct copy of an email from Michael Reina dated August 1, 2017, Bates stamped TWP003648.
8. Attached as **Exhibit 6** is a true and correct copy of an article published by GreaterLakewood.com on February 14, 2019 titled "EXCLUSIVE BOMBSHELL REPORT – Hate Group Appears To Blackmail Jackson Mayor To Not Allow Resolution Against Them."
9. Attached as **Exhibit 7** is a true and correct copy of an email from Kenneth Pieslak dated June 27, 2017, Bates stamped OBY13015-13016.
10. Attached as **Exhibit 8** is a true and correct copy of an email from Kenneth Pieslak dated February 14, 2017, Bates stamped TWP003639.

11. Attached as **Exhibit 9** is a true and correct copy of an email chain dated April 17, 2016, Bates stamped TWP001103-001105.
12. Attached as **Exhibit 10** is a true and correct copy of an email from Robert Nixon dated September 16, 2016, Bates stamped TWP000358-000360.
13. Attached as **Exhibit 11** is a true and correct copy of an email from Jeffrey Purpuro to Kenneth Pieslak dated March 6, 2017, Bates stamped TWP000065.
14. Attached as **Exhibit 12** is a true and correct copy of an email from William Campbell to Jeffrey Purpuro dated July 22, 2017, Bates stamped OBY13104-13106.
15. Attached as **Exhibit 13** is a true and correct copy of an email from a Jackson Township resident to Kenneth Pieslak, Robert Nixon, Jeffrey Purpuro, and Michael Reina dated February 1, 2017, Bates stamped TWP000336.
16. Attached as **Exhibit 14** is a true and correct copy of an email from a Jackson Township resident to Kenneth Pieslak, Jeffrey Purpuro, Helene Schlegel and Robert Nixon dated June 1, 2017, Bates stamped TWP002374.
17. Attached as **Exhibit 15** is a true and correct copy of an email chain between Michael Reina and a Jackson Township resident dated October 18, 2017, Bates stamped OBY15149-15151.
18. Attached as **Exhibit 16** is a true and correct copy of an email chain between a Jackson Township resident and Kenneth Pieslak, Jeffrey Purpuro, Michael Reina, and Helene Schlegel dated February 1, 2017, Bates stamped TWP000334-000336.
19. Attached as **Exhibit 17** is a true and correct copy of various citizen emails to Jackson Township officials, Bates stamped TWP003543-003555, TWP003551-003552, TWP003658-003660.

20. Attached as **Exhibit 18** is a true and correct copy of excerpts of the deposition of Jeffrey Purpuro, taken on November 13, 2018.
21. Attached as **Exhibit 19** is a true and correct copy of excerpts of the deposition of Ann Updegrave, taken on June 12, 2019.
22. Attached as **Exhibit 20** is a true and correct copy of excerpts of the deposition of Scott Martin, taken on June 13, 2019.
23. Attached as **Exhibit 21** is a true and correct copy of an email chain from a Jackson Township resident to Jackson Township Officials dated July 19, 2016, Bates stamped TWP000892-000898.
24. Attached as **Exhibit 22** is a true and correct copy of an email from a Jackson Township resident to Jackson Township Officials dated February 24, 2016, Bates stamped TWP001609-001611.
25. Attached as **Exhibit 23** is a true and correct copy of an email from a Jackson Township resident to Jackson Township Officials dated October 2, 2017, Bates stamped TWP003683-003684.
26. Attached as **Exhibit 24** is a true and correct copy of Jackson Township Ordinance No. 03-17.
27. Attached as **Exhibit 25** is a true and correct copy of Jackson Township Ordinance No. 04-17.
28. Attached as **Exhibit 26** is a true and correct copy of the Amended Complaint filed in the matter of *Oros Bais Yaakov High School v. the Township of Jackson*, New Jersey, et al., Docket No. PW-L-2981-14 (Law Div.).

29. Attached as **Exhibit 27** is a true and correct copy of a transcript prepared of the Jackson Township Council Regular Meeting held on March 16, 2017.
30. Attached as **Exhibit 28** is a true and correct copy of an article entitled “Jackson Dorm Law Advances Amid Cries of Anti-Semitism” published on APP.com dated March 7, 2017 and comments that appeared on same, Bates stamped OBY12592-12596. [URL: <https://www.app.com/story/news/local/communitychange/2017/03/06/jackson-dormitories-ordinance-lakewood-orthodox/98813682/>]
31. Attached as **Exhibit 29** is a true and correct copy of an article entitled “Jackson Council Approves Ban on Dormitories” published on APP.com dated March 17, 2017 and comments that appeared on same, Bates stamped OBY00883-00892. [URL: <https://www.app.com/story/news/local/communitychange/2017/03/16/jackson-lakewood-orthodox-dormitories/99253236/>]
32. Attached as **Exhibit 30** is a true and correct copy of Jackson Township Ordinance No. 30-10.
33. Attached as **Exhibit 31** is a true and correct copy of Jackson Township Ordinance No. 20-17.
34. Attached as **Exhibit 32** is a true and correct copy of an email chain between a Jackson Township resident and Jackson Township Officials dated July 27, 2017, Bates stamped TWP002241-002242 .
35. Attached as **Exhibit 33** is a true and correct copy of an email from Kenneth Pieslak to a Jackson Township resident and Jackson Township Officials dated April 6, 2017, Bates stamped TWP002170-002171.

36. Attached as **Exhibit 34** is a true and correct copy of an email from Jeffrey Purpuro to a Jackson Township resident and Jackson Township officials dated April 24, 2017, Bates stamped TWP002357-2358.
37. Attached as **Exhibit 35** is a true and correct copy of various emails from Jackson Township residents to Jackson Township officials regarding *eruvs* within the Township, Bates stamped OBY05000-05001, OBY05054, OBY05067-05068.
38. Attached as **Exhibit 36** is a true and correct copy of an email chain between a Jackson Township resident and Jackson Township officials dated February 14, 2017, Bates stamped TWP000212-000216.
39. Attached as **Exhibit 37** is a true and correct copy of an email from Michael Reina to Robert Nixon dated July 7, 2016, Bates stamped OBY01879.
40. Attached as **Exhibit 38** is a true and correct copy of a series of emails between Jackson Township residents and Jackson Township Officials regarding *eruvs* and enforcement of the right of way within the Township, Bates stamped TWP000300-000306.
41. Attached as **Exhibit 39** are true and correct copies of violation notices issued by the Township to various properties for having *eruvs*.
42. Attached as **Exhibit 40** is a true and correct copy of emails regarding the request to enforce the Township code regarding the right of way, Bates stamped TWP002189-002190.
43. Attached as **Exhibit 41** is a true and correct copy of Jackson Township Ordinance 18-15.

44. Attached as **Exhibit 42** is a true and correct copy of the relevant sections of the Township of Jackson Code regarding the rules and regulations for the Spray Park facility.
45. Attached as **Exhibit 43** is a true and correct copy of email complaints from Jackson Township residents to Jackson Township officials regarding real estate solicitation, Bates stamped TWP001580-001588, TWP000283-000285.
46. Attached as **Exhibit 44** is a true and correct copy of the webpage for the Jackson School District. [URL: <https://www.jacksonsd.org/domain/1644>]
47. Attached as **Exhibit 45** is a true and correct copy of Jackson Township Ordinance 21-16.
48. Attached as **Exhibit 46** is a true and correct copy of the Certification of Mitchell Newman in Support of Motion to Enforce Litigant's Rights, dated March 6, 2017.
49. Attached as **Exhibit 47** is a true and correct copy of the Certification of Frank J. Petrino in support of El at Jackson, LLC's Motion to Enforce Litigant's Rights dated December 7, 2016.
50. Attached as **Exhibit 48** is a true and correct copy of various emails regarding the Jackson Strong campaign, Bates stamped TWP001597-001611.
51. Attached as **Exhibit 49** is a true and correct copy of an article titled "Is Orthodox Jewish Rabbi pushing 'blockbusting?' Jackson wants investigation" published by NJ1015.com on August 1, 2016, Bates stamped OBY12570-12571. [URL: <https://nj1015.com/is-orthodox-rabbi-pushing-blockbusting-jackson-wants-investigation-watch/>]

52. Attached as **Exhibit 50** is a true and correct copy of excerpts of the transcript of the Jackson Township Zoning Board of Adjustment hearing held on June 18, 2014 in the matter of Oros Bais Yaakov High School.
53. Attached as **Exhibit 51** is a true and correct copy of an article titled “Jackson Township files complaint with Department of Justice over Religious Blockbusting” published by the Shore News Network dated July 27, 2016, Bates stamped OBY12643-12644.
54. Attached as **Exhibit 52** is a true and correct copy of the minutes of the Jackson Township Planning Board Meeting held on August 7, 2017, Bates stamped OBY20664-20666.
55. Attached as **Exhibit 53** is a true and correct copy of the Jackson Township complaint to the U.S. Department of Justice regarding blockbusting dated July 22, 2016 as appearing on the website [www.jacksonleaks.com](http://www.jacksonleaks.com).
56. Attached as **Exhibit 54** is a true and correct copy of the response by the New Jersey Attorney General to the Jackson Township complaint regarding blockbusting dated August 4, 2016 as appearing on the website [www.jacksonleaks.com](http://www.jacksonleaks.com).
57. Attached as **Exhibit 55** is a true and correct copy of the minutes of the Jackson Township Council Meeting held on July 26, 2016, Bates stamped OBY20667-20701.
58. Attached as **Exhibit 56** is a true and correct copy of the response by the U.S. Department of Justice to Jackson Township’s complaint regarding blockbusting, dated October 14, 2016.
59. Attached as **Exhibit 57** is a true and correct copy of a statement by Jackson Township regarding the Dormitory Ordinance, dated March 8, 2017.



60. Attached as **Exhibit 58** is a copy of a letter from Senator Samuel D. Thomson to the Jackson Township Council dated February 13, 2019.
61. Attached as **Exhibit 59** is a true and correct copy of an editorial titled “Jackson Council Abets Bias, Fear” published by APP.com dated May 17, 2016 and social media comments that were posted on same, Bates stamped OBY11627-11628, OBY11643. [URL: <https://www.app.com/story/opinion/editorials/2016/05/17/orthodox-watch-group-jackson/84508800/>].
62. Attached as **Exhibit 60** is a true and correct copy of an article titled “Division on Civil Rights Calls on Facebook to Monitor Comments on Group Page Encouraging Violence Against Orthodox Jews in Ocean County”, published by The Lakewood Scoop and dated April 5, 2019, Bates stamped OBY12504-12505. [URL: <https://www.thelakewoodscoop.com/news/2019/04/division-on-civil-rights-calls-on-facebook-to-monitor-comments-on-group-page-encouraging-violence-against-orthodox-jews-in-ocean-county.html>].
63. Attached as **Exhibit 61** is a true and correct copy of an article titled “Former Jackson Zoning Board Member Unleashes Anti-Semitic Tirade; Calls for Senator’s Suicide” published by the Shore News Network and dated September 12, 2017, Bates stamped OBY12316-12317. [URL: <https://shorenewsnetwork.com/2017/09/12/former-jackson-zoning-board-member-unleashes-anti-semitic-tirade-calls-for-senators-suicide/>].
64. Attached as **Exhibit 62** is a true and correct copy of an email from Jeffrey Purpuro to Helene Schlegel dated August 1, 2017, Bates stamped OBY12971.
65. Attached as **Exhibit 63** is a true and correct copy of an email from a Jackson Township resident to Michael Reina dated June 30, 2017, Bates stamped OBY13034.

66. Attached as **Exhibit 64** is a true and correct copy of an email from a Jackson Township resident to Jackson Township Officials dated July 3, 2017, Bates stamped TWP002960-002962.
67. Attached as **Exhibit 65** is a true and correct copy of the minutes from the Jackson Township Council meeting held on March 8, 2016.
68. Attached as **Exhibit 66** is a true and correct copy of excerpts of Section 244 of the Jackson Township Code.
69. Attached as **Exhibit 67** is a true and correct copy of an article titled “Jackson zoning, planning board members take cluelessness to the next level” published by APP.com on August 29, 2019. [URL: <https://www.app.com/story/opinion/columnists/2019/08/29/jackson-planning-board-zoning-orthodox-development/2139599001/>].
70. Attached as **Exhibit 68** is a true and correct copy of an article titled “Jackson zoners, planners quit after appearing at anti-development meeting” published by APP.com on August 28, 2019. [URL: <https://www.app.com/story/news/local/communitychange/2019/08/28/jackson-nj-zoning-planning-board-cupon-orthodox-jewish/2132123001/>].
71. Attached as **Exhibit 69** is a true and correct copy of an article titled “Jackson Board Member Resigns After Attending Meeting to Stop Jewish Development” published by Hamodia.com on August 26, 2019. [URL: <https://hamodia.com/2019/08/26/jackson-board-members-resign-attending-meeting-stop-jewish-development/>].

72. Attached as **Exhibit 70** is a true and correct copy of an email chain between a Jackson Township resident and Jackson Township Officials dated July 17, 2017, Bates stamped TWP002228-02230.
73. Attached as **Exhibit 71** is a true and correct copy of Jackson Township Resolution No. 368R-17.
74. Attached as **Exhibit 72** is a true and correct copy of the webpage for Bartley Healthcare located in Jackson, New Jersey. [URL: <https://www.bartleyhealthcare.com/about-us/contact/>]
75. Attached as **Exhibit 73** is a true and correct copy of the webpage for TipTam Camp Grounds located in Jackson, New Jersey. [URL: <https://tiptam.com/contact-us/>]
76. Attached as **Exhibit 74** is a true and correct copy of the webpage for Bella Terra Memory Care assisted living facility located in Jackson, New Jersey. [URL: <https://www.seniorlifestyle.com/property/bella-terra/>]
77. Attached as **Exhibit 75** is a true and correct copy of the webpage for Hackensack Meridian Health located in Jackson, New Jersey. [URL: <https://www.hackensackmeridianhealth.org/health-village/>]
78. Attached as **Exhibit 76** is a true and correct copy of the webpage for Timberlake Campground located in Jackson, New Jersey. [URL: <http://www.timberlandlakecampground.com/index.html>]
79. Attached as **Exhibit 77** is a true and correct copy of the webpage for Indian Rock RV Park & Campground located in Jackson, New Jersey. [URL: <https://indianrockrvpark.com/>]

80. Attached as **Exhibit 78** is a true and correct copy of the webpage for Butterfly Camping Resort located in Jackson, New Jersey. [URL: <http://www.butterflycamp.com/index.html>]
81. Attached as **Exhibit 79** is a true and correct copy of the webpage for Metedeconk National Golf Club located in Jackson, New Jersey. [URL: <https://www.metedekonk.org/club/scripts/section/section.asp?NS=HP>]
82. Attached as **Exhibit 80** is a true and correct copy of the webpage for Pine Barrens Golf Club located in Jackson, New Jersey. [URL: <http://pinebarrensgolf.com/golf/>]
83. Attached as **Exhibit 81** is a true and correct copy of the webpage for Jackson Premium Outlets located in Jackson, New Jersey. [URL: <https://www.premiumoutlets.com/outlet/jackson/about>]
84. Attached as **Exhibit 82** is a true and correct copy of an article published by APP.com on July 27, 2016, titled “Jackson Council: Investigate Orthodox Videos.” [URL: <https://www.app.com/story/news/local/communitychange/2016/07/27/orthodox-videos-jackson-council/87623212/>]
85. Attached as **Exhibit 83** is a true and correct copy of the webpage for George Hassler funeral home located in Jackson, New Jersey. [URL: <https://hasslerfuneralhome.com/>]

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 6, 2019.

/s/ Donna M. Jennings  
Donna M. Jennings (DJ7790)  
**WILENTZ, GOLDMAN & SPITZER, P.A.**  
90 Woodbridge Center Drive  
Post Office Box 10  
Woodbridge, New Jersey 07095  
*Co-Counsel for Plaintiff WR Property LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 6th day of September, 2019, the foregoing document was electronically filed via the Court's ECF system with notices to the following:

Howard B. Mankoff, Esquire  
Marshall Dennehey Warner Coleman & Goggin  
425 Eagle Rock Avenue, Suite 302  
Roseland, New Jersey 07068  
(973) 618-4118  
hmankoff@mdwgcg.com

Pauline F. Tutelo, Esquire  
Marshall Dennehey Warner Coleman & Goggin  
425 Eagle Rock Avenue, Suite 302  
Roseland, New Jersey 07068  
(973)618-4100  
pftutelo@mdwgcg.com

/s/Donna M. Jennings  
Donna M. Jennings (DJ7790)  
**WILENTZ, GOLDMAN & SPITZER, P.A.**  
90 Woodbridge Center Drive  
Post Office Box 10  
Woodbridge, New Jersey 07095  
*Co-Counsel for Plaintiff WR Property LLC*